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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

11 INSURANCE COMPANY OF THE WEST, a  
12 California corporation,

Case No.: 2:19-cv-00178-JCM-NJK

13 Plaintiff,

14 v.

15 RPS HOLDINGS, INC.; RANDOLPH SCHAMS  
16 as TRUSTEE of the SCHAMS FAMILY TRUST;  
17 CHRISTINE SCHAMS as TRUSTEE of the  
18 SCHAMS FAMILY TRUST; ELDORADO  
19 ESTATES LAS VEGAS, LLC; RANDOLPH P.  
20 SCHAMS, individually; CHRISTINE SCHAMS,  
individually; ROE CORPORATIONS I through X,  
inclusive; and DOE INDEMNITORS I through X,  
inclusive,

**STIPULATION AND ORDER TO  
EXTEND DEFENDANTS' TIME TO  
RESPOND TO PLAINTIFF'S  
COMPLAINT**

Defendants.

Plaintiff INSURANCE COMPANY OF THE WEST ("Plaintiff"), by and through its attorneys of record, Kurt C. Faux, Esq., Willi H. Siepmann, Esq., and Jordan F. Faux, Esq. of The Faux Law Group, and Defendants RPS Holdings, Inc., Randolph Schams as Trustee of the Schams Family Trust, Christine Schams as Trustee of the Schams Family Trust, El Dorado Estates Las Vegas, LLC, Randolph P. Schams, individually, and Christina Schams, individually (collectively "Defendants"), by

1 and through their attorneys of record, Deanna L. Forbush, Esq. and Bert Wuester, Jr., Esq. of Clark Hill  
2 PLLC, hereby stipulate to the following: 1) Plaintiff filed a Complaint against Defendants on January  
3 30, 2019 and served said Complaint upon Defendants on February 1, 2019; 2) Defendants' response to  
4 said Complaint is currently due on February 22, 2019; 3) the Parties agree that Defendants shall have  
5 an open ended extension to file a response to Plaintiff's Complaint. Plaintiff will provide Defendants  
6 with at least 20 days to file a responsive pleading upon notice from Plaintiff that settlement discussions  
7 are at an impasse.

8 The extension for Defendants' time to respond to Plaintiff's Complaint is being requested as the  
9 Parties discuss the possibility of resolving this matter without further litigation. There have been no  
10 previously requested extensions in this matter.

11 Dated this 14<sup>th</sup> day of February, 2019.

12 **THE FAUX LAW GROUP**

13 By: /s/ Kurt C. Faux, Esq.

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By: /s/ Deanna L. Forbush, Esq.

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**ORDER**

IT IS SO ORDERED.

Dated: February 14, 2019

  
United States Magistrate Judge